

STATE OF OHIO )  
 ) ss.  
COUNTY OF SUMMIT )

**AFFIDAVIT OF**  
**KAREN HASKINS**

Affiant, KAREN HASKINS, having been duly sworn according to law, deposes  
and states as follows:

1. I have been an employee of Summa Health Systems for 16 years. I am currently an Emergency Registrar in the Emergency Room at Summa's City Hospital.
2. Previously, I was a Financial Counselor in the Financial Counseling Department at City Hospital. I worked in that department for five years beginning on July 24, 1994 and ending in February 1999.
3. In the winter of 1998, I participated in the training of Beverly Jones to fill the position of Financial Counselor. Ms. Jones is white.
4. In late 1998 or early 1999, another white woman, Lee Lee, was also hired into the Financial Counseling Department.
5. At the beginning of February 1999, I was called into the office by Becky DiRocco and Diane Kramanek. At that meeting, they informed me that my position in Financial Counseling was being eliminated. I was told that I could accept the lay-off or I could accept a transfer to Emergency Room Registration. I was given one day to decide. I accepted the transfer.
6. In the transfer, I lost my departmental seniority. I was required to change from my regular eight hour shift, five days a week to a twelve-hour shift, three days a week. This part-time status robbed me of most of my benefits. I had to work for a year in order to reacquire my benefits.
7. I filed a charge of race discrimination with the Ohio Civil Rights Commission on Feb 24, 1999, Charge No. EEO C 22A995314 / FEPA AKC 23524. The Commission returned a no probable cause finding on November 16, 1999.

*I received my right to sue letter on  
Nov 23, 1999. from Equal Employment  
Opportunity Commission.*

8. Four other women were eliminated from the Financial Counseling department and all were African-American. Many of the women had five to ten years of seniority in the department. Beverly Jones and Lee Lee, the newest employees in the department, were not fired.
9. During my assignment in the Financial Counseling department, I became aware from first hand knowledge that the supervisors were discriminating against the staff. African-American Financial Counselors had a difficult time with the white department supervisors. We could not get the white supervisors to answer questions or provide us with extra help when we were short staffed. Financial Counselors in other hospitals in Summa Health System were not required to work the volume of client accounts as our department was required to handle.
10. Beth Tucker, who is white, was not questioned or penalized when she came to work late. The supervisors said she was excused because she was attending school. The supervisors did not require that Ms. Tucker provide any proof that she was at school when she was tardy.
11. If I was late to work, I received a disciplinary action.
12. Becky DiRocco was intimidated by the predominately African-American staff she was required to supervise. She did not want to move her office to be closer to the department because she was afraid of the staff.
13. Beverly Jones requested a transfer from <sup>FR reorganization</sup> Financial Counseling, because, she told me, the work was too much for her. She received her transfer without an interview by the other department supervisor. African-American employees had to interview for a transfer.
14. In August 1998, I was part of a contingent of African-American employees that requested and received a meeting with Summa Vice-President Dave Wilhoate to discuss the race discrimination within the Financial Counseling department. We had a specific agenda for the meeting and complained of racial discrimination by our department supervisors and manager.
15. Summa did not respond to our concerns. In fact, three months later Ms. DiRocco was promoted to Manager of Financial Counseling.

16. At the same time the Financial Counseling Manager position was posted, the Admitting Manager position was posted. Beverly Stallworth, who is African-American, would have been the most likely choice to move into that position because she was supervisor of Admitting at that time, same as Ms. DiRocco was in Financial Counseling. After one month, the Admitting Manager position was closed unfilled, allegedly because the position was not needed. In the next year, Linda Mackey, who is white, was placed in the position.

I have personal knowledge of the information included above.

FURTHER AFFIANT SAYETH NAUGHT.



KAREN HASKINS

SWORN TO BEFORE ME and subscribed in my presence this 16 day of

February 2000.



NOTARY PUBLIC

**VICKIE L. JONES**  
NOTARY PUBLIC, STATE OF OHIO  
Recorded in Cuyahoga County  
My Comm. Expires Mar. 30, 2004